

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

COALITION FOR CLEAN WATER, a  
non-profit organization,

Plaintiff,

v.

Case No.

Lower Court Case No. 15-101900-CZ

CITY OF FLINT, a municipal entity, and CITY  
OF FLINT ADMINISTRATOR, NATASHA  
HENDERSON, in her official capacity,

Defendants.

---

Trachelle C. Young (P63330)  
Attorney for Plaintiff  
2501 N. Saginaw Street  
Flint, MI 48505  
(810) 239-6302  
[trachelleyoung@gmail.com](mailto:trachelleyoung@gmail.com)

---

Anthony Chubb (P72608)  
William Y. Kim (P76411)  
CITY OF FLINT  
Attorneys for Defendants  
1101 S. Saginaw Street, 3<sup>rd</sup> Floor  
Flint, MI 48502  
(810) 766-7146  
[achubb@cityofflint.com](mailto:achubb@cityofflint.com)  
[wkim@cityofflint.com](mailto:wkim@cityofflint.com)

---

**NOTICE OF PRESENTMENT**

**TO: CLERK OF THE COURT**

**NOW COME** the Defendants and present to this Honorable Court a Notice of Filing of  
Notice of Removal to the United States District Court, Eastern District of Michigan, Southern  
Division.

**/s/ Anthony Chubb**

**Anthony Chubb (P72608)**

**William Y. Kim (P76411)**

**CITY OF FLINT**

**Attorneys for Defendants**

**1101 S. Saginaw Street, 3<sup>rd</sup> Floor**

**Flint, MI 48502**

**(810) 766-7146**

Dated: June 9, 2015

S:\AChubb\Active Litigation\Civil Cases\Coalition for Clean Water v. COF, N. Henderson\REMOVAL DOCUMENTS\Notice of  
Presentment.doc

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

COALITION FOR CLEAN WATER, a  
non-profit organization,

Plaintiff,

Case No.

v.

Lower Court Case No. 15-101900-CZ

CITY OF FLINT, a municipal entity, and CITY  
OF FLINT ADMINISTRATOR, NATASHA  
HENDERSON, in her official capacity,

Defendants.

---

Trachelle C. Young (P63330)  
Attorney for Plaintiff  
2501 N. Saginaw Street  
Flint, MI 48505  
(810) 239-6302  
[trachelleyoung@gmail.com](mailto:trachelleyoung@gmail.com)

Anthony Chubb (P72608)  
William Y. Kim (P76411)  
City of Flint Law Department  
Attorneys for Defendants  
1101 S. Saginaw Street, 3<sup>rd</sup> Floor  
Flint, MI 48502  
(810) 766-7146  
[achubb@cityofflint.com](mailto:achubb@cityofflint.com)  
[wkim@cityofflint.com](mailto:wkim@cityofflint.com)

---

**NOTICE OF REMOVAL TO THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION**

**NOW COME** Defendants, City of Flint and City of Flint Administrator, Natasha Henderson, by and through their attorneys, who, pursuant to 28 U.S.C §1441(b), hereby remove this action from the Circuit Court for the County of Genesee, Michigan, to the United States District Court for the Eastern District of Michigan, Southern Division, and in support thereof files this Notice of Removal for the following reasons:

1. Plaintiff has commenced an action against Defendants in the 7<sup>th</sup> Judicial Circuit Court for the County of Genesee, Michigan entitled *Coalition for Clean Water v. City of Flint, et al.*, Case Number 15-101900-CZ, assigned to Circuit Judge Archie L. Hayman. **(Exhibit A).**

2. Defendants were served on June 5, 2015 with the attached Summons and Complaint, Motion for Injunctive Relief (**Exhibit B**), and Plaintiffs (sic) Brief in Support of Motion for Injunctive Relief (**Exhibit C**).

3. This Court has original jurisdiction over this case based on federal question jurisdiction pursuant to 28 U.S.C. §1331.

4. For their federal law claims, Plaintiff alleges due process and equal protection violations contrary to the Fourteenth Amendment to the United States Constitution, 42 U.S.C. §1981, and 42 U.S.C. §1983, as well as violations of 42 U.S.C. §300f *et seq.*, the Safe Drinking Water Act. (**Exhibit A**).

5. Venue is proper pursuant to 28 U.S.C. §1391 because Genesee County, Michigan is contained within the Eastern District of Michigan.

6. This Notice of Removal is being timely filed within 30 days of Defendants' receipt of Plaintiff's Summons and Complaint, as required by 28 U.S.C. §1446(b).

7. Defendants City of Flint and Flint City Administrator, Natasha Henderson, join in the removal of this action, as required by 28 U.S.C. §1446(b)(2)(A).

8. Defendants will give written notice of the filing of this Notice of Removal to the adverse party and will file a copy of this notice of removal with the Circuit Court for the County of Genesee, as required by 28 U.S.C. §1446(d).

**WHEREFORE**, Defendants respectfully file this Notice of Removal, removing this action from the Circuit Court for the County of Genesee, State of Michigan, to the United States District Court for the Eastern District of Michigan, Southern Division.

Respectfully submitted,

/s/ Anthony Chubb  
**Anthony Chubb (P72608)**  
**William Y. Kim (P76411)**  
CITY OF FLINT LAW DEPARTMENT  
Attorneys for Defendants

Dated: June 9, 2015

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

COALITION FOR CLEAN WATER, a  
non-profit organization,

Plaintiff,

Case No.

v.

Lower Court Case No. 15-101900-CZ

CITY OF FLINT, a municipal entity, and CITY  
OF FLINT ADMINISTRATOR, NATASHA  
HENDERSON, in her official capacity,

Defendants.

---

Trachelle C. Young (P63330)  
Attorney for Plaintiff  
2501 N. Saginaw Street  
Flint, MI 48505  
(810) 239-6302  
[trachelleyoung@gmail.com](mailto:trachelleyoung@gmail.com)

---

Anthony Chubb (P72608)  
William Y. Kim (P76411)  
CITY OF FLINT  
Attorneys for Defendants  
1101 S. Saginaw Street, 3<sup>rd</sup> Floor  
Flint, MI 48502  
(810) 766-7146  
[achubb@cityofflint.com](mailto:achubb@cityofflint.com)  
[wkim@cityofflint.com](mailto:wkim@cityofflint.com)

---

**VERIFICATION**

Anthony Chubb and William Kim, being first duly sworn, depose and say that we are agents and attorneys of the City of Flint Department of Law, and that the foregoing Notice of Removal is true in substance and in fact to the best of our knowledge, information and belief.

**/s/ Anthony Chubb**

**Anthony Chubb (P72608)**  
**William Y. Kim (P76411)**  
CITY OF FLINT  
Attorneys for Defendants  
1101 S. Saginaw Street, 3<sup>rd</sup> Floor  
Flint, MI 48502  
(810) 766-7146

Dated: June 9, 2015

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

COALITION FOR CLEAN WATER, a  
non-profit organization,

Plaintiff,

Case No.

v.

Lower Court Case No. 15-101900-CZ

CITY OF FLINT, a municipal entity, and CITY  
OF FLINT ADMINISTRATOR, NATASHA  
HENDERSON, in her official capacity,

Defendants.

---

Trachelle C. Young (P63330)  
Attorney for Plaintiff  
2501 N. Saginaw Street  
Flint, MI 48505  
(810) 239-6302  
[trachelleyoung@gmail.com](mailto:trachelleyoung@gmail.com)

---

Anthony Chubb (P72608)  
William Y. Kim (P76411)  
CITY OF FLINT  
Attorneys for Defendants  
1101 S. Saginaw Street, 3<sup>rd</sup> Floor  
Flint, MI 48502  
(810) 766-7146  
[achubb@cityofflint.com](mailto:achubb@cityofflint.com)  
[wkim@cityofflint.com](mailto:wkim@cityofflint.com)

---

**CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2015, I electronically filed the foregoing documents with the Clerk of the Court using the ECF system and by mailing via First Class Mail and Electronic Mail to Plaintiff's counsel at the above address.

**/s/ Anthony Chubb**

**Anthony Chubb (P72608)**  
**William Y. Kim (P76411)**  
CITY OF FLINT  
Attorneys for Defendants  
1101 S. Saginaw Street, 3<sup>rd</sup> Floor  
Flint, MI 48502  
(810) 766-7146

Dated: June 9, 2015